

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

C&D CONTRACTORS, INC.,	:
	:
Plaintiff,	:
	:
v.	: Case No. 05-820-KAJ
	:
	:
TONI WILSON,	:
	:
Defendant.	:

PLAINTIFF'S INITIAL DISCLOSURES
PURSUANT TO RULE 26(a)(1)

Plaintiff, C&D Contractors, Inc. (hereinafter "C&D"), by and through its attorneys,
hereby discloses, pursuant to Federal Rule of Civil Procedure 26(a)(1), the following:

A. Name and Address of Individuals Likely to Have Discoverable Information:

Kathleen Ryan
734 Hertford Road
Wilmington, DE 19803

Robert Jones
1802 Gravers Lane
Wilmington, DE 19810

Ted Kalinowski
48 University Avenue
New Castle, DE 19720

C&D reserves the right to identify additional witnesses, as more information become available throughout discovery.

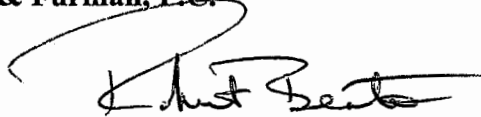
B. A Copy of, or Description by Category and Location of, Documents that Defendant May Use to Support Its Claims:

1. August 8, 2002, delay letter to PBM Construction, and the supporting documents containing the 25 exhibits often referred to as "the claim."

2. May 10, 2004 letter to Ms. Toni Wilson, and supporting documents outlining labor overruns.

C&D reserves the right to identify and rely on additional witnesses and documents not listed above, as such documents become available through investigation and discovery. The above documents will be available for inspection at counsel's office, at 1007 Orange Street, Nemours Building, Suite 205, Wilmington, DE 19801, at a mutually-convenient date and time.

**Cohen, Seglias, Pallas, Greenhall
& Furman, P.C.**

A handwritten signature in black ink, appearing to read "Robert K. Beste, Jr.", written over a horizontal line.

Edward Seglias, Esq.(I. D. No. 2822)
Robert K. Beste, Jr., Esq. (I. D. No. 154)
1007 Orange Street, Nemours Bldg., Suite 205
Wilmington, DE 19801
(302) 425-5089
Attorneys for Plaintiff

Date: April 12, 2006